

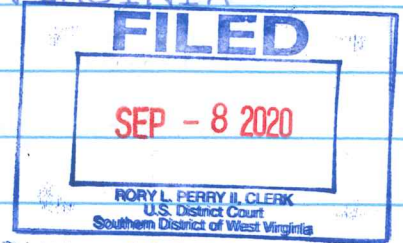
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Ronald L. Cosner, pro se,
Plaintiff,

v.

Novartis, Inc.,
Defendant.

Case No. 2:20-cv-00536



Motion For Leave To File An Amendment To
The Above Case Due To Misinformation
Misnaming The Defendant And Their Address

Comes now, the plaintiff, Ronald L. Cosner, and asks that this honorable court to allow this amendment to the complaint on file to remove the defendant on record, due to prison officials at M.O.C.C., where plaintiff is currently confined, providing him with the wrong name and address of the company who manufactures Zantac, the product this law suit is about. (See Exhibit Attached) The plaintiff is filing this to fix the mistake, he unknowingly made, to change the name and address of the defendant to :

Defendant's Name : Sanofi-Aventis, inc.,

Address : Sanofi, 55 Corporate Drive

P.O. Box 5925

Bridgewater, N.J. 08807

and please remove Novartis, Inc., as a defendant

and the address for this wrongly, misnamed defendant, that was based off inadequate information provide by M.O.C.C.

Declaration Under Penalties Of Perjury

I, The plaintiff, Ronald L. Cosner, does hereby declare under the penalties of perjury that this forgoing document is true and correct to the very best of my knowledge and belief.

Respectfully Submitted,

Signed: Ronald L. Cosner

Dated: 9-1-2020

ONE STAPLE ONLY

WVDCR Policy Directive 335.00

15 February 2020

Attachment #2

GENERAL DISTRIBUTION

WVDCR Inmate Grievance Form

Grievance No.

20 Mac 02-730

Ronald L. Cosner

3601729

8/16/2020

Inmate Name

OID #

Date of Grievance

State Nature of Grievance / Issue to be addressed (Note: 1 issue per grievance be concise file with Director of Inmate Services.
NO WRITING ON BACK):

About 3-weeks ago I asked for the name of the corporation which makes Zantac, because I have begun filing a lawsuit against them. I was given the address for Novartis inc., which was not the correct company or address, I also asked for the Agent listed to receive process of legal documents on behalf of the company who makes Zantac, and this address was not provided. The address given I filed my case against them believing I was given correct legal address and information, which I was not. This may hurt my \$250,000 lawsuit against the maker of Zantac and M.O.C.C. staff is responsible for it. The correct information I sought for my lawsuit, which is readily available to staff here, and if my lawsuit is dismissed for this reason \$250,000.00 in damages!

Ronald L. Cosner

(The inmate may attach one 8.5 x 11 sheet if necessary, at this level only)

Inmate's Signature

Director of Inmate Services Response (attach additional sheet if needed)

Accepted ☒ Rejected ☐ Reason for rejection: _____ Date: 24 Aug 2020

Response on Merits if accepted:

Zantac 55 Corporate Drive PO Box 5925 Bridgewater NJ 08807

Signature

Resolved: _____ (if so initial and give copy to Director of Inmate Services) Appealed to Superintendent _____ (initial) Date: _____

If no response at initial level is included the inmate certifies that he/she has tendered this grievance as indicated above and no response has been issued at that level within the time frames set forth in Policy Directive 335.00.

Inmate's Signature

Date

Action by Superintendent:

Accepted ☐ Rejected ☐ Reason for rejection: _____ Date: _____

Response on Merits if accepted: ☐ Remand to Unit for further action ☐ Affirm unit and/or deny grievance ☐ Grant the Grievance as specified

Comments

(Attach additional sheet if necessary)

Superintendent's Signature

Date

Resolved: _____ (if so initial and give copy to Director of Inmate Services) Appealed to Commissioner _____ (initial)

If no response at Superintendent's level is included, the inmate certifies that he/she has tendered this grievance as indicated above and no response has been issued at that level within the time frames set forth in Policy Directive 335.00.

Inmate's Signature

Date

Action by Commissioner:

Accepted ☐ Rejected ☐ Reason for rejection: _____ Date: _____

Response on Merits if accepted: ☐ Affirm Superintendent and deny grievance (Affix final stamp) ☐ Other, memo attached.

Clerk of Court
U.S. District Court for
S.D. of West Virginia
300 Virginia Street, East, Rm. 2400
Charleston, W.V. 25301

Please be aware the enclosed document has both front and back page, and it is of utmost importance that this honorable court rule on this motion before service is initiated, in this case, by this honorable court. Sorry, for any inconvenience this has caused, due to my unknowing error.

Thank you sincerely,

Ronald L. Cosner

9-1-2020

Ronald L. Cosner

M.D.C.C.

One Mountainside Way

Mt. Olive, W.V. 25185

Ronald L. Cosner 3601729
Mt. Olive Corr. Complex
One Mountainside Way
Mt. Olive, W.V. 25185

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U.S. District Court
Southern District of West Virginia

Clerk of Court
U.S. District Court
300, Virginia St., E., Rm. 2400
Charleston, W.V. 25301

Indigent Legal Mail

25301-253300

